1 2 3 4 5	Mario N. Alioto (56433) Joseph M. Patane (72202) Lauren C. Capurro (241151) TRUMP, ALIOTO, TRUMP & PRESCOTT LL 2280 Union Street San Francisco, CA 94123 Telephone: 415-563-7200 Facsimile: 415- 346-0679	P
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[PROPOSED] SCHEDULING ORDER

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Pursuant to this Court's Order at the April 9, 2019 Case Management Conference ("CMC"), the Indirect Purchaser Plaintiffs ("IPPs") submit the following proposed pretrial schedule for this case on behalf of IPPs and Defendants. IPPs have met and conferred with the Objectors and were unable to reach agreement on a proposed schedule.

April 19, 2019	Last day for counsel to file motion(s) for appointment as interim class counsel for certain state classes ("New States").
May 3, 2019	Last day for responses to motion(s) for appointment as interim class counsel for New States.
May 3, 2019	Last day for Objectors to file motion to vacate Stipulation and Order Modifying and Adopting Special Master's Report, Recommendations and Tentative Rulings Regarding Defendants' Joint Motion to Dismiss the Second Consolidated Amended Complaint of the Indirect Purchaser Plaintiffs, ECF No. 799 ("2010 Stipulated Order").
May 10, 2019	Last day for replies in support of motion(s) for appointment as interim class counsel for New States.
May 17, 2019	Last day for responses to motion to vacate 2010 Stipulated Order.
May 24, 2019	Last day for replies in support of motion to vacate 2010 Stipulated Order.
June 6, 2019 at 2:00 p.m.	Hearing on interim class counsel motions and motion to vacate 2010 Stipulated Order.
TBD^1	Mediation before Magistrate Judge Jacqueline Scott Corley.

¹ Pursuant to Court Order, Judge Corley will notify the parties of the date, time and place they are to appear. ECF No. 5427.

1	July 1, 2019
2	William (21) I G
3	Within twenty-one (21) days of service of new complaint(s).
4	Within fourteen (14) days of any motio
5	to dismiss the new complaint(s) pursuant to Fed. R. Civ. P. 12.
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7	Within seven (7) days of opposition to motion to dismiss.
8	October 14, 2019
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10	December 2, 2019
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12	December 6, 2019
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14	January 3, 2020
15	January 16, 2020
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17	January 20, 2020
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19	March 20, 2020
20	March 20, 2020
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22	April 20, 2020
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26	April 24, 2020
27	N. 1.2020
28	May 1, 2020

July 1, 2019	Last day to file and serve complaint(s) on behalf of New States.
Within twenty-one (21) days of service of new complaint(s).	Defendants respond to new complaint(s).
Within fourteen (14) days of any motion to dismiss the new complaint(s) pursuant to Fed. R. Civ. P. 12.	Last day for opposition to motion(s) to dismiss new complaint(s).
Within seven (7) days of opposition to motion to dismiss.	Last day for replies in support of motion(s) to dismiss new complaint(s).
October 14, 2019	Last day for New States to move for class certification.
December 2, 2019	Close of class certification discovery as to the New States.
December 6, 2019	Last day for opposition to class certification for New States.
January 3, 2020	Last day for reply in support of class certification for New States.
January 16, 2020	Hearing on New States' Class Certification
January 20, 2020	Last day for New States to serve opening expert reports on the merits; last day for Defendants to serve opening expert reports on affirmative defenses.
March 20, 2020	Last day for Defendants and IPPs to serve opposition expert reports as to New States; last day for the New States to serve opposition reports on affirmative defenses.
April 20, 2020	Last day for the New States to serve rebuttal expert reports on the merits; last day for Defendants to serve rebuttal expert reports on affirmative defenses and to any opposition reports served by IPPs as to the New States.
April 24, 2020	Close of merits expert discovery as to New States.
May 1, 2020	Last day to renew (as to the 22 Certified

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	Classes)/file (as to New States) dispositive motions.
May 11, 2020	Plaintiffs serve list of exhibits, deposition designations, and witnesses.
June 1, 2020	Last day to file oppositions to dispositive motions.
June 2, 2020	Defendants serve list of exhibits, deposition designations, and witnesses; and counterdesignations and objections to Plaintiffs' list of exhibits, deposition designations, and witnesses.
June 15, 2020	Last day to file replies in support of dispositive motions.
June 23, 2020	Plaintiffs serve counter-designations and objections to Defendants' list of exhibits, deposition designations, and witnesses.
June 30, 2020	Last day to renew (as to 22 Certified Classes)/file (as to New States) motions in limine and other non-dispositive pre-trial motions.
July 14, 2020	Defendants serve objections to Plaintiffs' counter-designations; Last day to file oppositions to motions in limine and other non-dispositive pretrial motions.
July 21, 2020	Last day to meet and confer re pre-trial order.
July 24, 2020	Last day for parties to file replies in support of motions in limine and other non-dispositive motions.
July 28, 2020	Last day for parties to exchange final proposed exhibits and witness lists; file pretrial order, agreed set of jury instructions, and verdict forms.
August 6, 2020	Hearing on motions in limine and other non-dispositive pre-trial motions, and final pre-trial conference.

	August 24, 2020	Trial	
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3	Dated: April 19, 2019	Respectfully submitted,	
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5		By: <u>/s/ Mario N. Alioto</u> MARIO N. ALIOTO (56433)	
6		LAUREN C. CAPURRO (241151)	
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9		Telephone: (415) 563-7200	
10		Facsimile: (415) 346-0679	
11		Lead Counsel for the Indirect Purchaser Plaintiffs	
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16	IT IS SO ORDERED.		
	DATED:		
17	DATED	Hon. Jon S. Tigar	
18		United States District Judge	
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		4 [PROPOSED] SCHEDULING ORDER	MDL NO. 1917
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